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United States of America
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IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ANTHONY RODRIGUEZ,
15 Defendant.

CASE NO. 1:20-CR-00236-NONE
STIPULATION TO CONTINUE SENTENCING
DATE; ORDER
DATE: September 24, 2021
TIME: 8:30 a.m.
COURT: Hon. Dale A. Drozd

16
17 STIPULATION

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
19 through defendant's counsel of record, hereby stipulate as follows:

20 1. By previous order, this matter was set for sentencing on September 24, 2021.
21 2. By this stipulation, defendant now moves to continue the sentencing until November 19,
22 2021. As this is a sentencing and a change of plea has already been entered, no exclusion of time under
23 the Speedy Trial Act is required.

24 3. The parties agree and stipulate, and request that the Court find the following:

25 a) The government has represented that the discovery associated with this case
26 includes voluminous jail phone calls, as well as additional electronic evidence only recently
27 discovered as part of a different related investigation. All of this discovery has been either
28 produced directly to counsel and/or made available for inspection and copying.

1 b) Counsel for defendant desires additional time to review the jail calls and the new
2 electronic evidence in order to prepare for sentencing.

3 c) Counsel for defendant has also been diligently seeking juvenile and military
4 records related to defendant and vital at sentencing, but has found these materials extremely
5 difficult to obtain.

6 d) Counsel for defendant believes that failure to grant the above-requested
7 continuance would deny her the reasonable time necessary for effective preparation, taking into
8 account the exercise of due diligence.

9 e) The government does not object to the continuance.

10 IT IS SO STIPULATED.

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12 Dated: July 16, 2021

PHILLIP A. TALBERT
Acting United States Attorney

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15 /s/ LAURA D. WITHERS
16 LAURA D. WITHERS
17 Assistant United States Attorney

18 Dated: July 16, 2021

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20 /s/ MEGHAN D. McLOUGHLIN
21 MEGHAN D. McLOUGHLIN
22 Counsel for Defendant
23 ANTHONY RODRIGUEZ

24 **FINDINGS AND ORDER**

25 IT IS SO ORDERED.

26 Dated: July 16, 2021

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29 *Dale A. Drayd*
30 UNITED STATES DISTRICT JUDGE